



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

Finalized Date: 12/01/2017

Subj: CAFO Inspection Report
Allendale Farm L.P.

From: Solanch Pastrana-Del Valle
Thru: Denny Dart
To: File

I. Facility Information

- A. *Facility Name:* Allendale Farm L.P.
- B. *Facility Location:* 2357 Jersey Street
Panton, VT 05491
- C. *Facility Contacts:* Joseph Allen, Owner
802-475-2583
- Claudia Allen, Owner
Same as Joseph Allen
- D. *NPDES ID Number:* None

II. Background Information

- A. *Date and time of inspection:*
Facility entrance: August 30, 2017, 9:00 am
Facility exit: August 30, 2017, 11:30 am
- B. *Weather Conditions:* Clear. About 60 degrees.
- C. *US EPA Representative(s):* Solanch Pastrana-Del Valle, Denny Dart
- D. *State/Local Representative(s):* Chris (Chip) Gianforno, VT DEC
- E. *Federally Enforceable Requirements Covered During the Inspection:*
CAFO requirements under the Clean Water Act at 40 C.F.R. Part 122.23.
- F. *Previous Enforcement Actions:*
No previous federal enforcement. Farm was inspected November 20, 2013 by Lisa Thuot of U.S. EPA. (See attached report).

III. Type and Purpose of Inspection

Under a National Enforcement Initiative (“NEI”) aimed at preventing animal waste from contaminating surface and ground water, the U.S. Environmental Protection Agency (“EPA”) has committed to inspect Concentrated Animal Feeding Operations (“CAFOs”) in priority watersheds across the country. CAFOs are a subset of livestock and poultry animal feeding operations (“AFOs”) that meet the regulatory thresholds of a number of animals for various animal types. Animals are kept and raised in confined situations for a total of 45 days or more in any 12-month period and feed is brought to the animals rather than the animals grazing or otherwise feeding in pastures, fields, or on a range of land during the confined period. In addition to inspecting, EPA is testing new sampling methods to identify the sources of bacteria and nutrients in ambient waters.

IV. Facility Description

Allendale Farm LP (“the Farm”) is a dairy operation owned by the Allen family. The primary business owner is Claudia Allen, with Joe Allen and Becky Allen as representatives. The farm has approximately 10 employees, when maximum production. The farm is approximately 1,100 acres, including 13 acres of pasture.

At the time of the inspection, there were approximately 580 mature milking cows and 250 young stock including calves. A calf was born during the inspection.

Proximity of Water Bodies

The farm is located about 1,600 feet (0.3 miles) uphill and west of Dead Creek. A tributary to Dead Creek flows less than fifty feet south of the production area. The northern part of the production area drains down a hill, or via a road to a heart-shaped forested wetland area which borders another tributary to Dead Creek. (*See maps and photos attached*).

V. Inspection

Entry Procedures

Denny Dart and Solanch Pastrana-Del Valle (“EPA Inspectors”) announced the inspection on Tuesday morning by phone to Claudia Allen.

The inspectors arrived at the farm at approximately 9:00AM. State inspector Chris (Chip) Gianforno was already at the farm when the inspectors arrived. Mr. Joe Allen greeted the inspectors at the farm entrance. The inspectors proceeded to explain the purpose of the inspection and presented their inspector credentials to him. Mr. Allen led the inspectors around the farm and answered questions.

Inspectors visited the calf barn and the pasture south of this near the southern tributary. They walked the perimeter of the farm, going clockwise from the south side. The inspectors observed several large swaths of significant nutrient burn east of the

production area indicating lagoon overflows. They observed two locations of burn where the lagoon likely breached. The inspectors observed the silage storage, mortalities pile and exterior of the barns.

Manure Management

Allendale Farm collects manure in a single lagoon, located downhill of most of the production area. The heifer barn is scraped directly into the manure pit. The farm just completed an expansion of the main barn, extending the roof east (see photos). The calf barn holds young stock until the age of 9 months. The calf bedding pack is cleaned out weekly and spread directly on fields. Manure from the lagoon is land-applied four times per year (on average) by an outside company.

Drinking Water Supply

Animals drink town water from water tubs in the barns. Until recently, the farm used city water for milk plate cooling, but a new recycling system will allow the plate cooling water to be recycled, and used for drinking rather than going to the manure lagoon.

Silage Storage

There is no leachate system for the silage storage, which has potential to cause a discharge towards Dead Creek.

Mortality Storage

The mortality pile is located right in the drip zone of the new barn roof, and uphill of dead creek. The farm only compost calves in the mortality piles. Matured cows are rendered for meat. Inspectors observed that rain water coming off the new barn roof would run through the mortality pile.

VI. Exit Interview

Inspectors, Denny Dart, Solanch Pastrana-Del Valle and Chris Gianforno met with Joe Allen and Claudia Allen, for the out-briefing at approximately 11:00 AM.

A summary of what inspectors communicated during the out-briefing is listed below:

- Evidence of manure lagoon overflows were observed; large burn spot east of the lagoon. Also the lagoon appeared to have been breached at two different locations (see photos).
- Location of mortality pile needs to be assessed due to potential contamination to stormwater runoff from new barn roof.
- Need for leachate collection system from silage bunks.